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Attorneys / Local Counsel for Defendant

SLATE ADVANCE LLC

[Caption Continued on Next Page]

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re:

THE LITIGATION PRACTICE GROUP
P.C.,

Debtor.

RICHARD A. MARSHACK, Trustee of
the LPG Liquidation Trust,

Plaintiff,

v.

WORLD GLOBAL FUND, LLC, *et al.*,

Defendants.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. Proc. No. 8:25-ap-01105-SC

**Second Stipulation for Order Extending
the Deadline for Defendant Slate Advance
LLC to Respond to the Trustee's
Complaint to May 14, 2025**

[No Hearing Required]

Continuation Page:

SHANNA M. KAMINSKI (P74013)

To be Admitted Pro Hac Vice

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Attorneys for Defendant

SLATE ADVANCE LLC

1 **TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES**
2 **BANKRUPTCY JUDGE:**

3 Plaintiff Richard A. Marshack, as Trustee of the LPG Liquidation Trust
4 (“**Plaintiff**”) and Defendant Slate Advance LLC (“**Defendant**”), through their respective
5 counsel, hereby enter into this Second Stipulation to extend the deadline to **Wednesday,**
6 **May 14, 2025**, for Defendant to file a responsive pleading to Plaintiff’s adversary
7 complaint filed on March 10, 2025, in the above-captioned adversary proceeding, and
8 respectfully represent as follows:

9 **RECITALS**

10 A. On March 10, 2025, Plaintiff commenced the above-captioned adversary
11 proceeding. (Dkt. No. 1).

12 B. On March 13, 2025, the Clerk of the Court issued a Summons (Doc. No. 6),
13 setting forth the deadline of April 14, 2025, to file and serve a written response to the
14 adversary complaint.

15 C. On May 5, 2025, the Parties entered into and filed a stipulation to extend the
16 deadline for Defendant to file a responsive pleading to May 9, 2025. (Dkt. No. 113).

17 D. Since that time, counsel for the Plaintiff has agreed to extend the deadline
18 for Defendant to file a responsive pleading to May 14, 2025. In light of the Defendant
19 requiring additional time to retain local counsel and given the length and complexity of
20 the Plaintiff’s adversary complaint, additional time is required for Defendant to file a
21 responsive pleading to Plaintiff’s complaint.

22 E. Therefore, by this second Stipulation, the Plaintiff has agreed, and the
23 Defendant requests, an extension for Defendant to file its responsive pleading to
24 Plaintiff’s Complaint, thereby extending the deadline for the Defendant to **Wednesday,**
25 **May 14, 2025.**

26 **NOW, THEREFORE**, the following is hereby stipulated and agreed to by and
27 among the Plaintiff and Defendant:

28 //

STIPULATION

1. The Recitals set forth above are hereby incorporated in full by this reference.

2. The current deadline for Defendant to file a written response to the
Plaintiff's adversary complaint shall be extended to May 14, 2025.

3. The extension is without prejudice to Defendant's right to seek further
timely extensions of the deadline to respond to Plaintiff's adversary complaint.

4. The Stipulation may be executed in one or more separate counterparts, and
signatures by facsimile or e-mail shall be deemed as originals.

IT IS SO STIPULATED.

Date: May 9, 2025

DINSMORE & SHOHL, LLP

By: 

Karen S. Hockstad
Christopher Ghio
Matthew H. Sommer

Attorneys for Plaintiff
RICHARD A. MARSHACK, AS TRUSTEE OF
THE LPG LIQUIDATION TRUST

Date: May 9, 2025

SALVATO BOUFADEL LLP

-and-

KAMINSKI LAW, PLLC

By: 

Joseph Boufadel
Gregory M. Salvato

Attorneys for Defendant
SLATE ADVANCE LLC

Salvato Boufadel
LLP

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Salvato Boufadel, LLP, 9110 Irvine Center Drive, Irvine, California 92618

A true and correct copy of the foregoing document entitled (*specify*): **Second Stipulation for Order Extending the Deadline for Defendant Slate Advance LLC to Respond to the Trustee's Complaint to May 14, 2025** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **05/09/2025** I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Joseph Boufadel** jboufadel@salvatoboufadel.com, Gsalvato@salvatoboufadel.com;gsalvato@ecf.inforuptcy.com
- **Christopher Ghio** Christopher.Ghio@dinsmore.com, angelica.urena@dinsmore.com
- **Karen Hockstad** karen.hockstad@dinsmore.com, kim.beavin@dinsmore.com
- **Ira David Kharasch** ikharasch@pszjlaw.com
- **Michael Lundholm** mlundholm@londonstoutlaw.com
- **Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **Victoria Newmark** vnewmark@pszjlaw.com, hdaniels@pszjlaw.com;bdassa@pszjlaw.com;hwinograd@pszjlaw.com
- **Brian A Paino** bpaino@hinshawlaw.com, hmosothoane@hinshawlaw.com;crico@hinshawlaw.com
- **Matthew Sommer** matthew.sommer@dinsmore.com, carrie.davis@dinsmore.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____ I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

05/09/2025
Date

Joseph Boufadel
Printed Name

/s/ Joseph Boufadel
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.